

JMH:MS
F. #2023R00989

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

----- X

UNITED STATES OF AMERICA

- against -

ANDRES FELIPE RUALES-ROJAS,

Defendant.

----- X

THE GRAND JURY CHARGES:

FILED
IN CLERK'S OFFICE
US DISTRICT COURT E.D.N.Y.
* JANUARY 18, 2024 *
BROOKLYN OFFICE

I N D I C T M E N T

Cr. No. 24-CR-24
(T. 18, U.S.C., §§ 924(d)(1),
981(a)(1)(C), 1951(a), 2 and 3551 et
seq.; T. 21, U.S.C., § 853(p); T. 28,
U.S.C., § 2461(c))

Judge Nicholas G. Garaufis
Magistrate Judge Vera M. Scanlon

COUNT ONE

(Hobbs Act Robbery Conspiracy)

1. In or about August 2023, within the Eastern District of New York and elsewhere, the defendant ANDRES FELIPE RUALES-ROJAS, together with others, did knowingly and intentionally conspire to obstruct, delay and affect commerce, and the movement of articles and commodities in commerce, by robbery, to wit: the robbery of jewelry from a commercial establishment located in Queens, New York (the "Commercial Establishment"), an entity the identity of which is known to the Grand Jury.

(Title 18, United States Code, Sections 1951(a) and 3551 et seq.)

COUNT TWO

(Hobbs Act Robbery)

2. On or about August 31, 2023, within the Eastern District of New York and elsewhere, the defendant ANDRES FELIPE RUALES-ROJAS, together with others, did knowingly and intentionally obstruct, delay and affect commerce, and the movement of articles

and commodities in commerce, by robbery, to wit: the robbery of jewelry from the Commercial Establishment.

(Title 18, United States Code, Sections 1951(a), 2 and 3551 et seq.)

CRIMINAL FORFEITURE ALLEGATION

3. The United States hereby gives notice to the defendant that, upon his conviction of either of the offenses charged herein, the government will seek forfeiture in accordance with: (a) Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), which requires any person convicted of such offense to forfeit any property, real or personal, constituting or derived from proceeds obtained directly or indirectly as a result of such offenses; and (b) Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, 2461(c), which require the forfeiture of any firearm or ammunition involved in or used in any violation of any other criminal law of the United States.

4. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided

without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to

seek forfeiture of any other property of the defendant up to the value of the forfeitable property described in this forfeiture allegation.

(Title 18, United States Code, Sections 924(d)(1) and 981(a)(1)(C); Title 21, United States Code, Section 853(p); Title 28, United States Code, Section 2461(c))

A TRUE BILL


FOREPERSON

By Whitman G.S. Knapp, Asst. U.S. Atty.

BREON PEACE

UNITED STATES ATTORNEY

EASTERN DISTRICT OF NEW YORK

No. _____

UNITED STATES DISTRICT COURT

EASTERN *District of* NEW YORK

CRIMINAL DIVISION

THE UNITED STATES OF AMERICA

vs.

ANDRES FELIPE RUALES-ROJAS,

Defendant.

INDICTMENT

(T. 18, U.S.C., §§ 924(d)(1), 981(a)(1)(C), 1951(a), 2 and 3551 et seq.;
T. 21, U.S.C., § 853(p); T. 28, U.S.C., § 2461(c))

A true bill.


Foreperson

Filed in open court this _____ day,

of _____ A.D. 20 _____

Clerk

Bail, \$ _____

Matthew Skurnik, Assistant U.S. Attorney (718) 254-6231